

REMARKS/ARGUMENTS

Interview Summary

Substantive telephonic conversations and/or communications were conducted with the Examiner, Jonathan Harper, by the Applicants' representative, Rabindranath Dutta. Reg. No. 51,010 on the following dates:

- (a) June 11, 2008 (related to claim amendments for expediting prosecution);
- (b) July 7, 2008 (related to claim amendments for expediting prosecution);
- (c) July 8, 2008 (related to claim amendments for expediting prosecution); and
- (d) July 15, 2008 (the Examiner left a voice mail for the Applicants' representative mentioning that claim amendments proposed by the Applicants' representative on July 8, 2008 were likely to expedite prosecution).

The citation of the Evans reference in rejecting claim 4, was an inadvertent oversight according to the Examiner. The Evans reference which was used in earlier office actions for rejections is not a basis for rejections in the office action dated 4/15/2008.

The arguments and amendments submitted herein incorporate the patentability arguments and amendments Applicants discussed/communicated with the Examiner. Applicants submit that the amendments and arguments presented herein make the substance of the discussions/interview(s) of record to comply with 37 CFR 1.133. If the Examiner believes that further information on the interview(s) needs to be made of record to comply with the requirements of 37 CFR 1.133, Applicants request the Examiner to identify such further information.

Request to Examiner for additional interviews if needed

Based on conversations with the Examiner, and the claim amendments made in this response, Applicants believe the claims would be found allowable over the cited art. Since Applicants would like to expedite prosecution, Applicants request the Examiner to call the Applicants representative, Rabindranath Dutta, Reg. No., 51,010 at telephone number 310-557-2292, should any further issues arise (e.g., minor claim amendments to any claim for grammatical error corrections, etc.) that may be resolved expeditiously via a telephone call through an Examiner's amendment or via a supplemental amendment.

Claims are amended for expeditious prosecution

This amendment is being filed in response to the final office action dated 4/15/2008. In the current amendment, Applicants have canceled all non-method claims, and amended at least the independent method claim 11. Applicants are not conceding in this Application that these and/or other amended and/or cancelled claims are not patentable over the art cited by the Examiner, as the present claim amendments and/or cancellations are only for facilitating expeditious prosecution of the application. Applicants respectfully reserve the right to pursue these and other claims, including the original claims, in one or more continuations and/or divisional patent application

Claim Rejections

Claims 11-16 and 18-20, and new claim 34 are pending in the application, of which claim 11 is the only independent claim.

In the office action dated 4/15/2008 all claims were rejected under 35 U.S.C. 103(a) as being unpatentable over:

- (a) Delphi 4 Unleashed Chapter 3 (referred to as “Polymorphism” by the Examiner), in view of
- (b) US 6,317,748 (referred to as “Menzies” by the Examiner).

Applicants have amended at least the independent claim 11 and traverse the rejection of the pending claims.

Amended Independent claim 11

Amended independent claim 11 is a method for managing devices, the method comprising:

receiving a request implemented via at least one device independent class;

traversing a class hierarchy database to determine at least one device specific class that corresponds to the at least one device independent class, wherein the class hierarchy database stores a class hierarchy and associations between classes;

modifying the received request, wherein in the modified request the least one device independent class has been translated to the at least one device specific class;

generating a device specific request in a device specific language; and

sending the device specific request in the device specific language to a managed device, wherein

(i) in the class hierarchy database, a first base class at a higher level in the class hierarchy is connected to a second base class and a third base class that are at a lower level in the class hierarchy, wherein the second and third base classes are connected via a base association;

(ii) in the class hierarchy database, the second base class is connected to a first specific class that corresponds to the first base class, the third base class is connected to a second specific class that corresponds to the second base class, wherein the first specific class and the second specific class are connected by a specific association;

(iii) in response to a request for specific association instances based on providing a source class corresponding to the second base class and a requested class corresponding to the third base class, deriving one class supported by the managed device via the specific association.

The following are the newly added requirements of claim 11:
“wherein

(i) in the class hierarchy database, a first base class at a higher level in the class hierarchy is connected to a second base class and a third base class that are at a lower level in the class hierarchy, wherein the second and third base classes are connected via a base association;

(ii) in the class hierarchy database, the second base class is connected to a first specific class that corresponds to the first base class, the third base class is connected to a second specific class that corresponds to the second base class, wherein the first specific class and the second specific class are connected by a specific association;

(iii) in response to a request for specific association instances based on providing a source class corresponding to the second base class and a requested class corresponding to the third base class, deriving one class supported by the managed device via the specific association.”

The newly added requirements of claim 11 are supported by at least the following sections of the Application:

- (a) FIG. 6; and
- (b) Paragraph 32 that describes FIG. 6.

Without limiting the claims in any way, Applicants submit that during the course of the interviews with the Examiner, Applicants had indicated to the Examiner how support for claim 11 was provided by FIG. 6. Applicants submit that the following explanation of the support provided by FIG. 6 for the new claim requirements is for illustrative purposes only and should not be construed as limiting claim 11 in any way.

- (i) “the first base class” of the claim requirements (supported by the Base Class A of FIG. 6);
- (ii) “the second base class” of the claim requirements (supported by Base Class B 608 of FIG. 6);
- (iii) “the third base class” of the claim requirements (supported by Base Class C 610 of FIG. 6);
- (iv) “the first specific class” of the claim requirements (supported by Specific Class A 616 of FIG. 6); and
- (v) “the second specific class” of the claim requirements (supported by Specific Class B 618 of FIG. 6).

Applicants submit that the cited Polymorphism discusses polymorphism. The cited Menzies discusses how management information of network devices is provided by mapping tree structured list of objects that describe network device information to a common information model (CIM).

Applicants respectfully submit, that neither the cited Menzies nor the cited Polymorphism either alone or in combination, teach, disclose, or suggest the new claim limitations of “wherein

- (i) in the class hierarchy database, a first base class at a higher level in the class hierarchy is connected to a second base class and a third base class that are at a lower level in the class hierarchy, wherein the second and third base classes are connected via a base association;
- (ii) in the class hierarchy database, the second base class is connected to a first specific class that corresponds to the first base class, the third base class is connected to a second specific class that corresponds to the second base class, wherein the first specific class and the second specific class are connected by a specific association;

(iii) in response to a request for specific association instances based on providing a source class corresponding to the second base class and a requested class corresponding to the third base class, deriving one class supported by the managed device via the specific association,” in combination with the other claim requirements that are present in claim 11.

For the above reasons claim 11 is patentable over the cited art.

Dependent claims 12-16, 18-20, 34

Additionally, claims 12-16, 18-20, 34 depend directly or indirectly on the pending independent claim 11. Applicants submit that these claims are patentable over the cited art because they depend from independent claims 11 which is patentable over the cited art for the reason discussed above, and because the combination of the limitations in the dependent claims and the base and intervening claims from which claims 18-20 depend provide further grounds of distinction over the cited art.

Amendments to the dependent claims

Amendments have been made to dependent claims in view of the amendments to the independent claims, so that antecedent basis errors are not introduced in the claims. The claim dependency of dependent claim 15 has been changed from claim 14 to independent claim 11.

New dependent claim 34

Support for the requirements of new claim 34 may be found in at least the requirements that have been deleted from currently amended claim 11.

Conclusion

For all the above reasons, Applicant submits that the pending claims are patentable over the art of record. Should any additional fees beyond those indicated be required, please charge Deposit Account No. 09-0466.

The attorney/agent invites the Examiner to contact him at (310) 557-2292 if the Examiner believes such contact would advance the prosecution of the case.

Date: July 15, 2008

By: _____/Rabindranath Dutta/_____

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